

# Case Screening Worksheet

This document contains preliminary recommendations to government decisionmakers. It was prepared in anticipation of litigation and protected from disclosure. Not subject to FOIA or Discovery. (Refer to instructions for additional descriptions.)

FACILITY: Knapheide Manufacturing Co. DATE: 10/29/91  
LOCATION: West Quincy, MO NAME: McCullers  
EPA ID NO.: MOD000766998 DIVISION: WSTM  
SIC CODE: \_\_\_\_\_ BRANCH: RCRA

Type of Business/Manufacturing Process: Metal Fabrications

TRI Data: Media: \_\_\_\_\_ Total lbs.: \_\_\_\_\_

Substances: XYLENE, waste oil

TYPE OF VIOLATION: LDR, manifest, waste <sup>Determine</sup> STATUTE RCRA

Repeat Violator \_\_\_\_\_

Continuing violation \_\_\_\_\_

Other Media \_\_\_\_\_

Reason for Federal Action: MDNR Referral

## CASE STRATEGY

<p><b>Pollution Prevention Potential</b> <u>To be determined</u></p> <p>a. TRI inventory reduction _____</p> <p>b. Recurring Violation _____</p> <p>c. Known feasible pp option _____</p> <p><b>Environmental Auditing Potential</b> <u>To be determined</u></p> <p>a. Underlying mgmt problem _____</p> <p>b. Pattern of violations _____</p> <p><b>Contractor Listing Potential</b> <u>To be determined</u></p> <p>a. Recurring/Continuing violation _____</p> <p>b. Existing Enforcement Action _____</p> <p>c. Multiple violating facilities/same owner _____</p> <p><b>Suspension and Debarment</b> <u>To be determined</u></p> <p>a. History of contractual poor performance _____</p> <p>b. Misconduct/Lack of integrity _____</p> <p>c. Repeat Violators _____</p> <p><b>Civil Judicial Potential</b> <u>Unknown</u></p> <p>a. Legal or program precedent _____</p> <p>b. Significant harm/risk _____</p> <p>c. Repeat or multimedia violator _____</p> <p>d. Need deterrence message _____</p> <p>e. Judicial oversight needed _____</p> <p>f. Desire to consolidate multimedia case _____</p> <p>g. Substantial penalty _____</p>	<p><b>Multimedia Potential</b> <u>unknown</u></p> <p>a. Current Violations <u>yes</u> _____</p> <p>b. Multimedia impacts _____</p> <p>c. Multimedia History of Noncompliance _____</p> <p>d. Use of other authorities _____</p> <p><b>Innovative Settlement Approaches</b> <u>To be determined</u></p> <p>_____</p> <p><b>Potential for Geographic, Source Category, or Pollutant Initiative</b> <u>To be determined</u></p> <p>a. Industrial sector w/comp. problem _____</p> <p>b. Critical Habitat/geographic area _____</p> <p>c. Priority Pollutant _____</p> <p><b>Criminal Enforcement Potential</b> <u>To be determined</u></p> <p>a. Potential document falsification _____</p> <p>b. Unauthorized discharge, emission, shipment, or release _____</p> <p>c. Monitoring or control equipment tampering _____</p> <p>d. Potentially deliberate, intentional, knowing violations _____</p> <p>e. Repeated violations _____</p> <p>f. Priority violation for criminal enforcement _____</p> <p><b>Other Federal Agency Potential</b></p> <p>Yes _____ Not determined <u>X</u></p>
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Remarks: \_\_\_\_\_



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